

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

<b>AC2T, Inc., d/b/a Spartan Mosquito,</b>	:	
<b>Plaintiff,</b>	:	<b>Civil Action</b>
<b>v.</b>	:	<b>Case Number: 2:19-cv-05946-RBS</b>
<b>Colin Purrington,</b>	:	<b>Jury Trial Demanded</b>
<b>Defendant.</b>	:	
	:	

**MOTION TO WITHDRAW AS COUNSEL**

AND NOW COMES, Alan L. Frank, Esquire, Evan L. Frank, Esquire and Alan L. Frank Law Associates, P.C. (hereinafter "ALF Law"), counsel for Plaintiff, AC2T, Inc., d/b/a Spartan Mosquito (hereinafter "Spartan Mosquito"), filing this Motion to Withdraw as Counsel and in support thereof, respectfully represents as follows:

1. Evan L. Frank, Esquire entered his appearance on behalf of Plaintiff, Spartan Mosquito on December 17, 2019.
2. Alan L. Frank, Esquire entered his appearance on behalf of Plaintiff, Spartan Mosquito on April 15, 2020.
3. Plaintiff, Spartan Mosquito has failed to fulfill obligations to Alan L. Frank, Esquire, Evan L. Frank, Esquire and ALF Law regarding legal services in this matter and have been given reasonable warning that Alan L. Frank, Esquire, Evan L. Frank, Esquire and ALF Law will seek to withdraw as counsel unless the obligations are fulfilled.
3. Evan L. Frank, Esquire, Alan L. Frank, Esquire and ALF Law have provided certain services on the clients' behalf pursuant to the terms of a Retainer Agreement in this matter without receiving payment for said services.
5. Evan L. Frank, Esquire, Alan L. Frank, Esquire and ALF Law have communicated by telephone and email on multiple occasions with client Spartan Mosquito concerning the aforesaid obligations.

WHEREFORE, Alan L. Frank, Esquire, Evan L. Frank, Esquire and Alan L. Frank Law Associates, P.C. pray that this court permit them to withdraw their appearance as counsel of record for the Plaintiff, AC2T, Inc., d/b/a Spartan Mosquito in the above captioned matter.

ALAN L. FRANK LAW ASSOCIATES, P.C.



ALAN L. FRANK, ESQ. (#34414)

EVAN L. FRANK, ESQ. (#311994)

ALAN L. FRANK LAW ASSOCIATES, P.C.

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Dated: January 30, 2024